

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Index NO.: 08-0357 (SCR)

DEBORAH FELDMAN,
Plaintiff,

v.

ERIC M. BERMAN,
ERIC M. BERMAN, P.C. and
JOHN DOE 1-10, XYZ, INC. 1-10,
Defendants.

ANSWER TO
COUNTERCLAIMS

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DEBORAH FELDMAN, Plaintiff, by and through her attorney, Law Office of Shmuel Klein, PC, hereby ANSWERS Defendants, ERIC M. BERMAN and ERIC M. BERMAN, P.C., as and for her Answer to Counterclaims as follows:

1. Plaintiff denies all allegations contained in Paragraphs 77, 80, 81, 82, 85,86, 87, 88 of the Answer and First Counterclaim.
2. Plaintiff denies all allegations contained in Paragraphs 89, 90, of the Answer and Second Counterclaim.
3. Plaintiff demands pursuant to Rule 11 that Defendants withdraw its Counterclaims.

WHEREFORE the Plaintiff demands judgment against defendants, further adjudging Defendants' conduct was in bad faith and is estopped from asserting any defense and for such further and other relief as the court may determine is just, proper and equitable in the premises.

Dated: February 5, 2008
Spring Valley, NY

_____/s/ Shmuel Klein
Shmuel Klein (SK 7212) Fed Court Only
Law Office of Shmuel Klein, PC
Attorneys for Plaintiff
268 ROUTE 59
Spring Valley, NY 10977
(845) 425-2510

CERTIFICATE OF SERVICE

STATE OF NEW YORK)

COUNTY OF ROCKLAND)

I, Shmuel Klein, an attorney admitted before this court, affirms under the penalties of perjury that I am not a party to this action and that I am over the age of 18 years old. I have offices located at 268 Route 59, Spring Valley New York and I served the within Answer on February 5, 2008 by mailing a true copy thereof to:

Eric M. Berman and Eric M. Berman PC
500 West Main St Suite 212
Banylon, NY 11702

_____/s/_____
Shmuel Klein (SK 7212) Fed Court Only
Law Office of Shmuel Klein, PC
Attorney for Debtor
268 ROUTE 59
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DEBORAH FELDMAN, Plaintiff, by and through her attorney, Law Office of Shmuel Klein, PC,
hereby ANSWERS Defendants, ERIC M. BERMAN and ERIC M. BERMAN, P.C., as and for her
Answer to Counterclaims as follows:

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WHEREFORE the Plaintiff demands judgment against defendants, further adjudging Defendants' conduct was in bad faith and is estopped from asserting any defense and for such further and other relief as the court may determine is just, proper and equitable in the premises.

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